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Attorneys for Saldutti Law Group and Robert L. Saldutti

Peter A. Ragone, Esq.

Gerald M. Jacobs, Esq.

Hearing Date and Time:

October 31, 2017 at 10:00 A.M.

Objection Deadline:

October 24, 2017 at 4:00 P.M.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

Chapter 11

15 JOHN CORP.,
a/k/a LES HALLES,
a/k/a FIRST ADMIN, INC.

Case No. 16-12453 (MEW)

Debtor.

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**NOTICE OF MOTION OF SALDUTTI LAW GROUP AND ROBERT L. SALDUTTI
TO VACATE THE AUTOMATIC STAY**

PLEASE TAKE NOTICE, that upon the Affidavit of Robert L. Saldutti sworn to the 3rd day of October, 2017 and upon the Affirmation of Gerald M. Jacobs, Esq. dated October 9, 2017 and upon all the exhibits annexed thereto, the undersigned attorneys of record for Saldutti Law Group and Robert L. Saldutti shall move before the Honorable Michael E. Wiles, United States Bankruptcy Judge, Room 617, at the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004, on October 31, 2017, at 10:00 A.M. or as soon thereafter as counsel may be heard, for entry of an Order: (i) granting Saldutti Law Group and Robert L. Saldutti relief from the Automatic Stay pursuant to 11 U.S.C. § 362(a) as against non-debtor Philippe Lajaunie, so that Saldutti Law Group and Robert L. Saldutti may prosecute its action now pending and stayed as against Philippe Lajaunie in the Philadelphia

County Court of Common Pleas; (ii) waiving of F.R.B.P. Rule 4001(a)(3); and (iii) further relief as the Court may deem proper.

PLEASE TAKE FURTHER NOTICE, that papers in opposition to this Motion, if any, must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy court of the Southern District of New York, and shall be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court's case filing system in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov.) and by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, and shall be served in accordance with General Order M-399, the Court's rules and other applicable law upon: (1) Rosner Nocera & Ragone, LLP, counsel for Saldutti Law Group and Robert L. Saldutti; and (ii) the Office of the United States Trustee in order that they be received no later than seven (7) days prior to the return date of this Motion.

Dated: New York, New York
October 9, 2017

ROSNER NOCERA & RAGONE, LLP

By: /s/ Gerald M. Jacobs
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15 John Corp. Notice of Motion to Vacate ds 10.17